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May 3, 2019

The application is ☒ granted.  
☐ denied.

Hon. Edgardo Ramos  
United States District Court  
United States Courthouse  
40 Foley Square  
New York, New York 10007

  
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**Edgardo Ramos, U.S.D.J.**  
Dated: 5/17/19  
New York, New York 10007

Re: United States v. El Gammal, 15 Cr. 588 (ER)

Dear Judge Ramos:

I was appointed by the Second Circuit to represent defendant Mohammed El Gammal on appeal. In my review of the files, I have discovered a number of sealed transcripts that have not been provided to me. I am writing to request that the defense be authorized to receive copies of this sealed material from the court reporters, and to review it for purposes of determining its relevance to issues that may be presented on appeal.

Counsel for the government, Brendan Quigley, has informed me that the government takes no position on the unsealing of this material. At this time, however, we are not asking that any transcript be unsealed other than for purposes of the review referred to above. Prior to including or referring to any of this material in an unsealed submission or otherwise making it public, we would seek a further order of the Court.

The transcripts to which seek access are as follows:

1/18/17 sealed matter referenced (but apparently separately transcribed) at p. 1050.  
1/19/17 sealed matter redacted at pp. 1116-1117 and p. 1144  
1/23/17 sealed matter redacted at pp. 1458-1469  
1/24/17 sealed matter redacted at p. 1717  
1/26/17 sealed matter redacted at p. 1925 and pp. 1949-1950

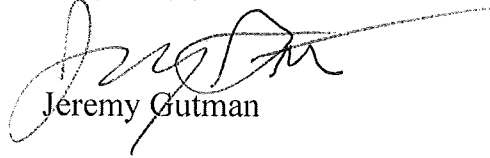
Thank you for your consideration of this request.

Hon. Edgardo Ramos

May 3, 2019

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Very truly yours,

A handwritten signature in black ink, appearing to read "Jeremy Gutman", with a long horizontal flourish extending to the right.

Jeremy Gutman

cc: Brendan Quigley, Esq. (by email)